

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VIRGIL FLAVIU GEORGESCU,

Defendant.

14 CR 799 (RA)

**DECLARATION OF  
MICHAEL P. STERNHEIM**

MICHAEL P. STERNHEIM declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am an associate of the law firm Fried, Frank, Harris, Shriver & Jacobson LLP, CJA counsel to Virgil Flaviu Georgescu, the defendant in the above-captioned action. I am a member in good standing of the New York State Bar and of the Bar of this Court.

2. I submit this declaration in support of Mr. Georgescu's motion for compassionate release (ECF No. 160).

3. Attached as Exhibit A is a true and correct copy of a screen shot of the inmate locator results for Mr. Georgescu on the Bureau of Prisons ("BOP") website, <https://www.bop.gov/inmateloc/> (last accessed on April 29, 2021).

4. Attached as Exhibit B is a true and correct copy of a letter to the Court from Mr. Georgescu's mother, Floarea Ciobanu, dated April 22, 2021, in Romanian, accompanied by a certified English translation.

5. Attached as Exhibit C is a true and correct copy of medical records of Ms. Ciobanu from a hospital stay from March 10 to March 12, 2021, in Romanian, accompanied by a certified English translation.

6. Attached as Exhibit D is a true and correct copy of medical records of Ms. Ciobanu, dated October 19, 2020, in Romanian, accompanied by a certified English translation.

7. Attached as Exhibit E is a true and correct copy of medical records of Ms. Ciobanu, dated October 15, 2018, in Romanian, accompanied by a certified English translation.

8. Attached as Exhibit F is a true and correct copy of a “Characterisation” by Simion Nedeia (mayor of the Vitanesti Commune in Teleorman County, Romania), dated November 2, 2020, in Romanian, accompanied by a certified English translation.

9. Attached as Exhibit G is a true and correct copy of a signed declaration of Mr. Georgescu’s wife, Andra Georgescu, dated April 29, 2021.

10. Attached as Exhibit H is a true and correct copy of the death certificate of Mr. Georgescu’s father, Stefan Ciobanu.

11. Attached as Exhibit I is a true and correct copy of a screen shot of the inmate locator results for Massimo Romagnoli on the BOP website, <https://www.bop.gov/inmateloc/> (last accessed April 29, 2021).

12. Attached as Exhibit J is a true and correct copy of a screen shot of the inmate locator results for Cristian Vintila on the BOP website, <https://www.bop.gov/inmateloc/> (last accessed April 29, 2021).

13. Attached as Exhibit K is a true and correct copy of an article published in the *New York Times* on April 13, 2021 titled “Three virus patients die at a hospital in Romania after its oxygen supply malfunctions,” available at <https://www.nytimes.com/2021/04/13/world/three-virus-patients-die-at-a-hospital-in-romania-after-its-oxygen-supply-malfunctions.html> (last accessed April 29, 2021).

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
April 30, 2021 in Brooklyn, New York.

A handwritten signature in black ink, appearing to read "Michael Sternheim", with a stylized flourish at the end.

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MICHAEL P. STERNHEIM  
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